



May 18, 2016

Mr. Mike Greenwald (3WP42)
NPDES Enforcement Branch
Water Protection Division
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103

Dear Mr. Greenwald:

**Information Requirement for Antrim Township
Sewage Treatment Facility Pretreatment Program (NPDES PA0080519)**

The following is in response to the Information Requirement issued to Antrim Township March 15, 2016 with an effective date of March 21, 2016. The effective date represents the day the Information Requirement was received by the Township. The information provided herein was due 30 days from the effective date, however the Township received a 30-day extension per the attached correspondence which changed the due date to May 20, 2016. Detailed contact information as described in Section IV.12 is shown on Table 1.

Table 1. Detailed contact information.

| Name | Address | Telephone No. | Title | Relationship to ATMA ¹ |
|-------------------------|---|---------------|--|-----------------------------------|
| Carl S. Rundquist, P.E. | Antrim Township 10655 Antrim Church Rd. Greencastle, PA 17225 | 717-597-9798 | Public Works Director/ Pretreatment Coordinator | Antrim Township Employee |
| Roger Nowell | Antrim Township 10655 Antrim Church Rd. Greencastle, PA 17225 | 717-597-9798 | Operator | Antrim Township Employee |
| Nancy Adams | GHD 1240 North Mountain Rd. Harrisburg, PA 17112 | 717-541-0622 | Senior Environmental Scientist | Consultant |

The original numbered comment is shown in **bold** followed by the Township's response indicated by *italics*. Table 2, at the end of the response narrative, provides a listing of the information requested per Sections III.5 and III.6 of the Information Requirement and includes the name of the person responding, the name of the person consulted in preparing the response and identification of the documents consulted in preparing the response, as appropriate. Exhibits provided herein are numbered according to the comment addressed.

¹ Antrim Township Municipal Authority (ATMA)



15. Provide a list of Sanitary Sewer Overflows (SSO) which occurred in the collection system owned and/or operated by Antrim Township from January 1, 2011 through the present. Please submit all documents related to each SSO, including but not limited to the:

- a) Date;
- b) Duration of discharge;
- c) Location;
- d) Receiving water body;
- e) Volume (indicate actual or estimated);
- f) Cause;
- g) Analytical results of wastewater discharged;
- h) Remedial or mitigating actions; and
- i) Correspondence with PADEP

Exhibit 15-1 contains the requested information relative to SSOs from 1/1/2011 through the present.

16. Provide a list of Bypass events which occurred after the head works of the wastewater treatment plant owned and/or operated by Antrim Township from January 1, 2011 through the present. Please submit all documents related to each bypass event-including but not limited to the:

- a) Date;
- b) Duration of discharge;
- c) Location;
- d) Receiving water body;
- e) Volume (indicate actual or estimated);
- f) Cause;
- g) Analytical results of wastewater discharged;
- h) Remedial or mitigating actions; and
- i) Correspondence with PADEP

No documentation can be found regarding bypass events that occurred after the headworks of the WWTP owned by Antrim Township Municipal Authority and operated by Antrim Township from January 1, 2011 through the present.

17. Provide and list Significant Industrial Users (SIUs) and Categorical Industrial Users (CIUs) discharging to the Antrim Township sewage treatment facility. For each SIU and CIU, provide the current pretreatment discharge permit, self-monitoring reports (including chain of custody forms) from January 1, 2011 through the present.

List of SIUs and CIUs Discharging to the Antrim Township Municipal Authority WWTP:

- Grove LLC, Wastewater Discharge Permit (WWDP) #10-001:
 - Exhibit 17-1: IU Permit
 - Exhibit 17-2: Draft IU Permit (to be revised to reflect CIU status)
 - Exhibit 17-3: Self-Monitoring Reports and COCs from 1-1-2011 to present
- Eldorado Stone, Permit No. WWDP #09-001:
 - Exhibit 17-4: IU Permit



- Exhibit 17-5: Self-Monitoring Reports and COCs from 1-1-2011 to present (no record of self-monitoring reports prior to 7/31/2012)
- Mountain View Landfill, Permitting in Progress
 - Exhibit 24-1: See response to Requirement Nos. 11 and 21.

- 18. Provide documents related to compliance monitoring activities conducted by Antrim Township generated from January 1, 2011 through the present, including but not limited to inspection reports for each SIU and CIU and compliance sampling results.**

Documents related to compliance monitoring activities conducted by Antrim Township from January 1, 2011 through the present are attached as follows:

- Exhibit 18-1: Inspection Reports for SIUs/CIUs – Grove
- Exhibit 18-2: Inspection Reports for SIUs/CIUs – Eldorado Stone
- Exhibit 18-3: Compliance Monitoring Reports – Grove
- Exhibit 18-4: Compliance Monitoring Reports – Eldorado Stone

- 19. If the Antrim Township Enforcement Response Plan (ERP) has been revised during the past 5 years, provide the previous (ERP(s)) with the effective dates of each.**

The Antrim Township Enforcement Response Plan has not been revised during the past five years. A copy of the current Enforcement Response Plan is provided under Exhibit 19-1.

- 20. If the Antrim Township Sewer Use Ordinance (SUO) has been revised during the past 5 years, provide the previous (SUO(s)) with the effective dates of each.**

Ordinance No. 311 which added Chapter 111 (Pretreatment) to the Code of the Township of Antrim was adopted April 8, 2008 and amended April 14, 2015 to reflect the EPA-approved local limits. Ordinance No. 311 is included as Exhibit 20-1 and Ordinance No. 341 of 2015 amending Ordinance 311 is included as Exhibit 20-2.

- 21. Identify all SIUs and CIUs for which the need for a slug discharge control plans has been evaluated or required and provide copies of all related documents, including but not limited to internal correspondence, and correspondence with SIUs or CIUs.**

Refer to the responses to Requirements No. 9 and No. 21 of the Pretreatment Compliance Audit Report Summary included as Exhibit 24-1. Information documenting the need for slug discharge control plans is provided as follows:

- Exhibit 18-1: 2012 Compliance Inspection Report for Grove, LLC

- 22. Provide documents generated from January 1, 2011 to present, that relate to known or suspected instances of pass-through or interference at the Antrim Township wastewater treatment plant including but not limited to internal correspondence and correspondence with SIUs or CIUs.**

There is no known documentation from January 1, 2011 to the present related to known or suspected instances of pass-through or interference at the Antrim Township Municipal Authority wastewater treatment plant.



23. Provide documents generated from January 1, 2011 through the present related to SIU or CIU industrial wastewater discharge permit violations including documents related to enforcement of industrial wastewater discharge permits, as required by the Enforcement Response Plan or otherwise.

Documentation from January 1, 2011 to the present related to IU permit violations is included as follows:

- *Notice of Violations (NOV) and follow-up documentation*
 - *Exhibit 23-1 – Grove NOVs*

24. Review the Pretreatment Compliance Audit Summary Report (July 15, 2014), Attachment A hereto and provide a response to each of the items set forth in Sections 12.1 and 12.2.

A response to Sections 12.1 and 12.2 of the Pretreatment Compliance Audit Summary Report is provided under Exhibit 24-1.

Table 2. Listing of information requested per Sections III.5 and III.6 of the Information Requirement.

| Comment No. ² | Name of Person Responding ³ | Name of Person Consulted in Preparing Response ³ | Documentation Consulted in Preparing Response | |
|--------------------------|--|---|---|---|
| | | | Exhibit No(s). | Other |
| 15 | Carl Rundquist | Not Applicable | 15-1 | DEP File Review 4-21-16 performed by Carl Rundquist |
| 16 | Carl Rundquist | Not Applicable | --- | DEP File Review 4-21-16 performed by Carl Rundquist |
| 17 | Carl Rundquist Roger Nowell | Nancy Adams | 17-1, 17-2, 17-3, 17-4, 17-5, 24-1 | |
| 18 | Carl Rundquist Roger Nowell | Nancy Adams | 18-1, 18-2, 18-3, 18-4 | |
| 19 | Carl Rundquist Roger Nowell | Not Applicable | 19-1 | |
| 20 | Carl Rundquist Roger Nowell | Nancy Adams | 20-1, 20-2 | |
| 21 | Carl Rundquist Roger Nowell | Nancy Adams | 18-1, 24-1 | |
| 22 | Carl Rundquist Roger Nowell | Not Applicable | --- | DEP File Review 4-21-16 performed by Carl Rundquist |
| 23 | Carl Rundquist Roger Nowell | Nancy Adams | 23-1 | |
| 24 | Carl Rundquist Roger Nowell | Nancy Adams | 24-1 | |

² Comment No. corresponds to Part V. of March 15, 2016 Information Requirement issued to Antrim Township.

³ Detailed contact information for each person identified is shown in Table 1.



Please feel free to contact me should you have any questions concerning the information contained in this response.

Sincerely,
GHD

A handwritten signature in black ink that reads "Nancy Adams". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Nancy Adams

Sr. Environmental Scientist

Enclosures

C: Carl Rundquist, Antrim Township, P.O. Box 130, 10655 Antrim Church Rd., w/ enclosures
Roger Nowell, Antrim Township, P.O. Box 130, 10655 Antrim Church Rd., w/ enclosures

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